



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 29, 2015

RAMESH VERMA, TREASURER  
MICHIGAN DEMOCRATIC STATE CENTRAL  
COMMITTEE  
606 TOWNSEND ST.  
LANSING, MI 48933

**Response Due Date**  
**11/03/2015**

IDENTIFICATION NUMBER: C00031054

REFERENCE: APRIL MONTHLY REPORT (03/01/2015 - 03/31/2015)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. A review of the reports filed by your committee indicates that your committee received one or more contributions from "IBEW PAC VOLUNTARY FUND" which has been disclosed on their report(s) of receipts and disbursements as a contribution for the non-federal account (see attached). Please be advised, contributions deposited in a federal account must meet the following conditions: the contributions are designated or expressly solicited for use in connection with federal elections and contributors are informed that their contributions are subject to the limits and prohibitions of the Act. 11 CFR §102.5(a)

If any apparently misdeposited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If the contribution(s) received was misdeposited into the federal account, you may have to make a refund. If within 30 days of receipt you (1) transferred the misdeposited amount to an account not used to influence federal elections, and (2) provided a written notice to the committee making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

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If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the misdeposited amount must be refunded. (11 CFR §103.3(b)(1))

Please clarify if the contribution(s) received from the disclosed donor's federal account was permissible. If the contribution was intended for a non-federal account, please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer-out or refund. Although the Commission may take further legal action regarding the misdeposited funds, your prompt action will be taken into consideration.

2. Commission Regulations require the continuous reporting of all outstanding debts. This report omits debts itemized on your previous report(s). Please file an amendment to your report to disclose the current status of these omitted debts: Sachs Waldman. (11 CFR §§ 104.3(d) and 104.11)

3. Line 18(a), Column A of the Detailed Summary Page on your Amended February Monthly (1/1/15 - 1/31/15), received 8/11/15, Amended March Monthly (2/1/15 - 2/28/15), received 8/20/15, and April Monthly (3/1/15 - 3/31/15) Reports combined, discloses \$328,442.71 in transfers from the non-federal account for allocated activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$242,336.34 as the non-federal share for allocated activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for allocated activity, transfers for allocated activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. (11 CFR §§106.6(e)(2) and 106.7(f)(2)) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an

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enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1169.

Sincerely,



Kevin Fortkiewicz  
Senior Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:  
(check only one)

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<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input checked="" type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

International Brotherhood of Electrical Workers Political Action Committee

Full Name (Last, First, Middle Initial)

**A. Citizens for Dan Cronin**

Mailing Address P O Box 441

City Lombard State IL Zip Code 60148

Purpose of Disbursement  
2015 Voluntary/Non-Federal/Primary

011

Category/  
Type

Candidate Name

Dan Cronin

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY  
02 / 18 / 2015

Transaction ID : 64225644

Amount of Each Disbursement this Period

500.00

2015 Voluntary/Non-Federal/Primary

Full Name (Last, First, Middle Initial)

**B. Michigan Democratic State Central Committee**

Mailing Address 606 Townsend

City Lansing State MI Zip Code 18933

Purpose of Disbursement  
2015 Voluntary/Non-Federal

011

Category/  
Type

Candidate Name

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY  
02 / 18 / 2015

Transaction ID : 64225648

Amount of Each Disbursement this Period

5000.00

2015 Voluntary/Non-Federal

Full Name (Last, First, Middle Initial)

**C. Jackson County Democratic Committee**

Mailing Address 308 W Maple Suite 101

City Independence State MO Zip Code 64050

Purpose of Disbursement  
2015 Voluntary/Non-Federal

011

Category/  
Type

Candidate Name

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY  
02 / 18 / 2015

Transaction ID : 64225812

Amount of Each Disbursement this Period

1000.00

2015 Voluntary/Non-Federal

**SUBTOTAL** of Disbursements This Page (optional)..... ►

**TOTAL** This Period (last page this line number only)..... ►

6500.00